

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

TROY CONNELL,)	
)	
Plaintiff,)	
)	
v.)	2:21-cv-629-GMB
)	
JEFFERSON DUNN, et al.)	
)	
Defendants.)	

JOINT NOTICE OF OUTSTANDING DISCOVERY

Plaintiff Troy Connell (“Plaintiff”) and Defendants Joe Binder, Zackery McLemore, Samuel Aaron, and Keller Speaks (“Defendants”) (collectively “the Parties”) hereby jointly submit this Notice of Outstanding Discovery in compliance with this Court’s December 5, 2023 Order. (Doc. 62). The Parties state as follows:

The Parties will need discovery on the date and circumstances of the incident and Plaintiff’s report of the incident; all of Plaintiff’s claims and allegations made in the First Amended Complaint (Doc. 23); Defendants’ defenses, including affirmative defenses and immunity; injuries and damages including Plaintiff’s medical history and any other issues raised by the pleadings in this case. To achieve the required discovery, the Parties anticipate the following:

1. Deposition of Plaintiff, Troy Connell;
2. Deposition of Defendant, Joe Binder;

3. Deposition of Defendant, Zackery McLemore;
4. Deposition of Defendant, Samuel Aaron;
5. Deposition of Defendant, Keller Speaks;
6. Potential Deposition of Fact Witness, Inmate Tyrone Burgess;
7. Potential Deposition of Fact Witness, Inmate Cedric Young;
8. Potential Deposition of Fact Witness, Steven Williams;
9. Potential Deposition of Fact Witness, Inmate “Turtle,” whose identity has not yet been confirmed;
10. Potential Deposition of Fact Witness, Sergeant Gaston (“Big G”), who has not yet been fully identified;
11. Deposition of Plaintiff’s Expert Witness, if any;
12. Deposition of Defendants’ Expert Witness, if any;
13. Interrogatories to be served on the Defendants by the Plaintiff; and
14. Plaintiff’s Answers to Interrogatories and Responses to Requests for Production of Defendants.

Respectfully submitted this 19th day of December 2023.

/s/ Frank Ozment

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